

# ALSTON & BIRD LLP

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March 21, 2011

## ***VIA UPS OVERNIGHT DELIVERY***

Mike Hom  
Water Protection Division  
U.S. EPA Region 4  
Atlanta Federal Center  
61 Forsyth Street  
Atlanta, Georgia 30303-8960

2011 MAR 22 A 10:14


**Re: Compost Information**

Dear Mr. Hom:

This letter provides information from Dalton Utilities in response to your March 11, 2011 email request to Dena Haverland for compost sampling results. The enclosures are a letter dated March 15, 2011, with a certification signed by Mr. Don Cope, President and CEO of Dalton Utilities; and compost sampling results.

Please contact me if have any questions regarding the information supplied pursuant to the Request.

Sincerely,



Lee A. DeHihns, III

LAD:gba  
Enclosures

LEGAL02/31578197v26



March 15, 2011

Mr. Mike Hom  
Clean Water Enforcement Branch  
Water Protection Division  
U.S. Environmental Protection Agency, Region 4  
61 Forsyth Street, SW  
Atlanta, GA 30303-8960

2011 MAR 22 A 10:14

Re: Compost Information

Dear Mr. Hom,

In response to your email dated March 11, 2011, Dalton Utilities sampled several batches of the finished compost before resuming distribution in May 2010. The results of these sampling events are contained in Attachments A, B, C, D, and E which are provided herein as bound reports titled Test America Laboratories, Inc. Analytical Report on Perfluorocarbon (PFC) Analysis Job # 280-2628-1, 280-3403-1, 280-7008-1, 280-8169-1, and 280-10749-2 which contain 268, 272, 199, 202, and 198 pages, respectively.

As illustrated in the attached results, all batches of finished compost met the self-imposed limitation of 1,600 parts per billion (ppb) for PFOA. Several batches met the self-imposed limitation of 600 ppb for PFOS and several were just slightly above this self-imposed limit which is an order of magnitude below the direct contact residential soil screening level.

Due to the difficult nature of the analyses, the inherent variability in the recovery of the analytes of interest from complex matrices, and the range of acceptable quality control recovery limits the results indicate that further evaluations of these batches of compost may be necessary. Analysis to check influent, or untreated wastewater, concentrations to the wastewater treatment plants indicated that levels of PFCs remain extremely low, almost undetectable and consistent with previous sample results.

Only the batches found to be below the self-imposed levels have been released for distribution.

If you have any questions, please contact me at 706-529-1091 or [dcope@dutil.com](mailto:dcope@dutil.com).

*I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.*

Sincerely,



Don Cope  
President & CEO

Attachments (5)

- c: Ms. Gail Mitchell, United States Environmental Protection Division (cover letter only)  
Mr. Allen Barnes, Georgia Environmental Protection Division (cover letter only)  
Dr. Marlin Gottschalk, Sustainability Division Georgia Department of Natural Resources (cover letter only)  
Dr. Becky Champion, Georgia Environmental Protection Division (cover letter only)  
Dr. Bert Langley, Georgia Environmental Protection Division (cover letter only)  
Lee A. DeHihns, Esq.